

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

VENESSA EDWARDS, : **CHAPTER 13**
Debtor : **BANKRUPTCY NO. 14-18792-amc**

STIPULATION

WHEREAS, the Debtor, Venessa Edwards, filed a voluntary petition under Chapter 13 of the Bankruptcy Code on November 3, 2014;

WHEREAS, the Debtor's Second Amended Chapter 13 was confirmed by the Court on December 20, 2016;

WHEREAS, on December 19, 2017, the Debtor filed a Motion to Modify Plan After Confirmation, attaching a proposed Third Amended Chapter 13 Plan, but the Motion to Modify Plan After Confirmation was denied on February 6, 2018;

WHEREAS, on January 25, 2018, the Trustee filed a Motion to Dismiss the above-referenced case for failure of the Debtor to maintain her monthly plan payments to the Trustee;

WHEREAS, on May 21, 2018, the Debtor filed a second Motion to Modify Plan After Confirmation, attaching a proposed Fourth Amended Chapter 13 Plan, and later filed a revised version of the proposed Fourth Amended Chapter 13 Plan on September 21, 2018;

WHEREAS, the Debtor has partially performed on her obligations under the proposed Fourth Amended Chapter 13 Plan, including a recent \$3,000.00 lump sum payment, and currently is due under that proposed Plan for only the November, 2018 payment;

WHEREAS, the proposed Fourth Amended Chapter 13 Plan requires the Debtor to make a lump sum payment within six months that the Debtor anticipates receiving from financing one

or more of her properties in the Temple University area; and

WHEREAS, the parties would like to resolve this matter amicably and avoid the time and expense of further litigation;

NOW THEREFORE, in consideration of the above-referenced considerations, the Trustee and the Debtor hereby stipulate and agree as follows:

1. The Debtor shall make the \$15,408.23 lump sum payment to the Trustee from financing real estate by no later than May 20, 2019, and shall also be current on regular monthly payments of \$500.00 by that date.
2. The Trustee consents to Court approval of the Debtor's Motion to Modify Plan After Confirmation, and the proposed Fourth Amended Chapter 13 Plan filed as an amended Exhibit "A" on September 21, 2018, and the Debtor may file that Plan of record.
3. Nothing in this Stipulation prevents the Trustee from relisting the Motion to Dismiss if the Debtor fails to maintain the regular \$500.00 monthly payments during the six month period between now and May 20, 2019.
4. To the extent any of the payments to become current on the Fourth Amended Chapter 13 Plan are made but not posted to the Trustee's account by May 20, 2019, Debtor shall provide images of the payments to the Trustee by May 20, 2019.
5. On or before May 24, 2019, the Debtor shall submit a certification to the Court stating whether the payments required under this Stipulation have been made and therefore whether the Trustee's Motion to Dismiss shall be deemed withdrawn, or rather whether the Debtor has not made the required payments as provided herein, in which case, the

Court may dismiss the case pursuant to the terms of this Stipulation.

REGIONAL BANKRUPTCY CENTER OF
SOUTHEASTERN PA, P.C., by:

Date: November 20, 2018


Roger V. Ashodian

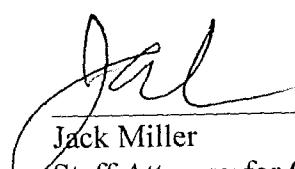
Attorney for the Debtor

Date: 11-20-2018


Venessa Edwards
Venessa Edwards, Debtor

CHAPTER 13 STANDING TRUSTEE, by:

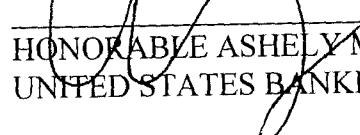
Date: 11-20-18


Jack Miller
Staff Attorney for Chapter 13 Standing Trustee

ORDER

AND NOW, this 20 day of Nov, 2018, it is hereby **ORDERED**
that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.

BY THE COURT:


HONORABLE ASHELY M. CHAN
UNITED STATES BANKRUPTCY JUDGE